

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13  
:   
Jose Sierra, Jr. :   
:   
and :   
:   
Mary Smeltzer, :   
:   
Debtors. :   
: Docket No. 23-12704

NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE

Freedom Credit Union has filed a Motion for Relief from the Automatic Stay with the court to terminate the stay as to the 2015 Dodge Charger VIN 2C3CDXEJ6FH844192 and to permit movant to exercise its rights under state law to repossess and sell the automobile.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before January 16, 2024 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

900 Market Street, Suite 400  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be **received** on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Robert M. Morris, Esq.  
Morris & Adelman, P.C.  
P.O. Box 2235  
Bala Cynwyd, PA 19004  
215-568-5621  
Fax: 215-568-3253

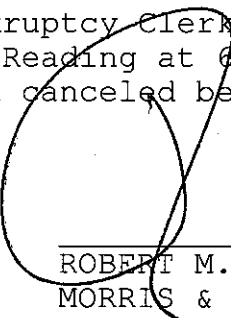
2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on February 7, 2024, at 11:00 A.M. in Courtroom 4, United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office in Philadelphia at 215-408-2800 or Reading at 610 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

Date: 12/18/2023

  
ROBERT M. MORRIS, ESQ.  
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Bala Cynwyd, PA 19004